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VIA ECF

December 16, 2022

Honorable John P. Cronan
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 12D
New York, NY 10007

Aamir A. Kazi
Principal
kazi@fr.com
404 724 2811 direct

Re: *W.P.V., on his own behalf and on behalf of his minor child, W.P.O. v. U.S., et al.*
Civ. Action No. 1:21cv4436

Dear Judge Cronan:

The parties provide the below update regarding the above-captioned case.

Plaintiffs and Cayuga Centers (“the settling parties”) have reached a settlement agreement (the United States government is not a part of this settlement). The settling parties understand that this Court has ordered that the settling parties have until December 16, 2022 to finalize the agreement and to file a joint stipulation of dismissal. Because this settlement agreement will be made on behalf of an infant, however, Southern District of New York Local Civil Rule 83.2(a) (Settlement of Actions by or on Behalf of Infants or Incompetents) requires that the settling parties seek leave of Court to settle this action for the agreed-upon terms. Accordingly, pursuant to this Court’s Individual Rules and Practices in Civil Cases, the settling parties jointly file this pre-motion letter requesting permission to file a joint motion for leave to settle Plaintiffs claims against Cayuga Centers on the agreed-upon terms. Due to the intervening holidays, the settling parties request until January 13, 2023 to file the joint motion for leave to settle.

We thank the Court for its consideration of this matter.

Respectfully submitted,

The request is granted. The parties shall submit a joint motion for leave to settle Plaintiff's claims by January 13, 2023. The parties should include a proposed order with their motion.

SO ORDERED.

December 19, 2022
New York, New York



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Dated: December 16, 2022

/s/ Aamir A. Kazi

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/s/ Rachael Marvin (with permission)

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Cayuga Centers